

1 2 3 4 5	STEVEN L. BROWN, SBN 166278 DOUGLAS A. GESSELL, SBN 210112 LAW OFFICES OF BROWN & GESSELL 2155 W. March Lane Suite 2B Stockton, CA 95207 Telephone (209) 430-5480 Facsimile (209) 466-5480 Email: sbrown@brown-gessell.com dgessell@brown-gessell.com		
6	Attorneys for Plaintiff		
7	UNITED STATES DISTRICT COURT		
8	EASTERN DISTRICT OF CALIFORNIA		
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10	ROBERTO ROJAS, by and through his) No. 2:21-cv-01086-DAD-AC (PC)	
11	Guardian Ad Litem, Sergio Rojas,) AMENDED STIPULATION AND	
12	Plaintiff,	PROPOSED ORDER ALLOWING MOTION TO AMEND THE DISCOVERY	
13		AND SCHEDULING ORDER TO BE HEARD ON SHORTENED TIME	
14	V.) Date: April 9, 2025	
15	CALIFORNIA DEPARTMENT OF CORRECTIONS AND) Time: 10:00 a.m.) Ctrm: 26, 8 th Floor	
16	REHABILITATION, et al.,) Judge: Hon. Allison Claire) Trial Date: TBD	
17	Defendants.	Action Filed: 3/11/21	
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20	RECITALS		
21	Whereas the parties in this case are currently engaged in pre-trial discovery;		
22	Whereas plaintiff seeks an order from this Court by separate motion modifying the		
23	current Discovery and Scheduling Order by adding approximately 60 days to each of the		
24	deadlines on the Court's November 21, 2024 order;		
25	Whereas plaintiff has not requested any prior amendments to the Discovery and		
26	Scheduling Order;		
27	Whereas counsel for plaintiff has agreed to file and serve the Motion to Amend the		
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1	Discovery and Scheduling Order by 5:00 p.m. of	on March 20, 2025; and	
2	Whereas the parties have agreed to	set the Motion to Amend the Discovery and	
3	Scheduling Order for hearing on April 9, 2025 at 10:00 a.m., with opposition to the motion to be		
4	filed and served by 5:00 p.m. on April 2, 2025, with no written reply by plaintiff.		
5	Based on the foregoing, counsel for Plaintiff and Defendants hereby stipulate to have the		
6	Motion to Amend the Discovery and Scheduling Order be filed and served by 5:00 p.m. on		
7	March 20, 2025, with the hearing on the motion set for April 9, 2025, at 10:00 a.m. and with		
8	defendants' opposition to be filed and served by 5:00 p.m. on April 2, 2025 with no written reply		
9	by plaintiff.		
10	IT IS SO STIPULATED.		
11	Dated: March <u>19</u> , 2025 LA	AW OFFICES OF BROWN & GESSELL	
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13		even L. Brown torney for Plaintiff	
14		DB BONTA	
15	At	torney General of California Y M. GOLDMAN	
16	<u> </u>	pervising Deputy Attorney General	
17		Jours Joseph	
18		liet Lompa eputy Attorney General	
19	At	torneys for Defendants	
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1	ORDER
2	IT IS SO ORDERED.
3	DATED: March 21, 2025
4	ALLISON CLAIRE
5	ALLISON CLAIRE
6	UNITED STATES MAGISTRATE JUDGE
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